

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
v.)	
)	No. 4:20-CR-00418 JAR (NAB)
)	
JAMES TIMOTHY NORMAN,)	
)	
Defendant.)	

**GOVERNMENT'S RESPONSE TO DEFENDANT'S REQUEST FOR
EXTENSION OF TIME WITHIN WHICH TO FILE PRETRIAL MOTIONS (DOC. #140)**

COMES NOW the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Angie E. Danis, Assistant United States Attorney for said District, and files its Response to Defendant's Request for Extension of Time Within Which to File Pretrial Motions (Doc. #140).

On July 2, 2021, counsel for Defendant James Timothy Norman filed an unopposed request for additional time to file pretrial motions (Doc. #140). While it is accurate that the Government does not oppose said request, the Government wishes to clarify the record with regard to the discovery in this matter. Counsel represented that "Defense counsel have been in ongoing discussions with the Government regarding various discovery matters and issues. To date, Defendant has not received the full extent of the Government's discovery relating to the case mainly due to the inordinate volume associate with same." (Doc. #140, pg. 2, ¶4).

This is an accurate representation and counsel for Norman has frequently communicated with the Government with regard to the organization, volume, and complexity of the discovery in this matter. However, the Government wishes to clarify that it has made the entirety of the discovery in this matter available, reaching out to counsel on April 12, 2021; May 11, 2021; and

June 22, 2021, requesting a hard drive on which to place the items that constitute Volume 4 of the discovery production. Furthermore, on or about April 28, 2021, the Government conducted a “reverse proffer” with counsel explaining to them the evidence against Norman, and where in the various productions to locate many of the documents the Government referenced during the meeting. As of the date of this writing, the Government has not received a hard drive from counsel for Norman on which to load Volume 4, so they do not yet have it in their possession. Once counsel for Norman provides said hard drive, they will immediately receive the remaining discovery related to the matters for which Norman stands charged.

The Government does not oppose counsel’s Motion for Extension, but simply provides this correspondence in order to clarify the record with regard to the production of discovery.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Angie E. Danis
ANGIE E. DANIS, #64805MO
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of July, 2021, I filed a true and correct copy of the foregoing electronically with the Clerk of the Court, to be served by way of the Court’s electronic filing system upon the attorneys for the defendant.

/s/ Angie E. Danis
ANGIE E. DANIS, #64805MO
Assistant United States Attorney